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FAA-04-17041-9

Docket Management Facility, U.S. Department of Transportation  
400 Seventh Street SW Nassif Building, Room PL-401  
Washington, DC 20590-0001

February 23, 2004

Dear Department of Transportation,

I am writing in regard to Docket number FAA-2004-17041 under Title 14, Part 36 of the Code of Federal Regulations. The docket is titled "Noise Stringency Increase for Single-Engine Propeller-Driven Small Airplanes" and proposes a decrease in takeoff noise allowed to small single engine propeller airplanes. Although multi-engine aircraft produce more noise, the proposal only applies to single engine airplanes because they are the ones used for the majority of flight training. The proposal is a derivative of complaints made by residents in close proximity to aircraft training facilities, which I believe, is unfair to begin with because real estate values are lower near airports for that very reason. If a person chooses to live near an airport they must sacrifice a little noise for a lower mortgage.

On a federal level, this proposal seems unsuitable because it does not meet the specifications needed for approval. First of all, the benefits of the intended regulation can in no way justify its costs because you cannot put a monetary value on noise reduction. Secondly, there are no economic advantages which would allow for businesses to flourish in the vicinity of an airport. This can be proven by the fact that many businesses have been conducted near airports for years.

The FAA believes that this rule "would impose minimal, if any, costs on supplemental type certificate applicants." Why would an STC be necessary unless a modification to the aircraft was

needed? And don't you think that this modification would cost the aircraft owner money?

Although the noise standards are met by airplanes currently in production, what about most training aircraft which have been in circulation for years? The FAA has determined that this proposed rule would not have a significant adverse economic impact on a substantial number of small entities. What numbers does the FAA use to justify "significant" and "substantial"?

The final point this proposal fails to hit is that it "would provide more uniform noise certification standards for airplanes certificated in the United States and in the JAA countries. The harmonization of the noise limits would simplify airworthiness approvals for import and export purposes." My question is: How many single-engine propeller-driven small airplanes are used for international import and export purposes?

Sincerely,



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